



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

November 16, 2016

Mr. Michael Perkins  
Vice President, Engineering  
Connor Homes, LLC  
1741 Rte. 7 South  
Middlebury, VT 05753

RE: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and State of Vermont Hazardous Waste Management Regulations, 10 V.S.A. Chapter 159, Section 7-701-7-916.

Dear Mr. Perkins:

On July 27, 2016, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was, in part, to determine the compliance of Connor Homes, LLC (Connor Homes), with the relevant hazardous waste management regulations for the State of Vermont and the corresponding federal Hazardous Waste Management Regulations found at 40 C.F.R. Parts 260-272. The State of Vermont has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of State of Vermont Hazardous Waste Management Regulations, 10 V.S.A. Chapter 159, Section 7-701-7-916 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

- Failure to maintain an up-to-date Vermont Hazardous Waste Handler Site ID Form, filed with the State of Vermont, that accurately describes current waste activity and waste generation. Specifically, at the time of the inspection, Connor Homes had notified Vermont that it was operating as a Large Quantity Generator of hazardous waste, but practices observed and reviewed historic records revealed that the facility operates as a Small Quantity Generator of Hazardous waste.
- Failure to label satellite and "less than 180-day" containers of hazardous waste with the words "hazardous waste, and a description of its contents.
- Failure to keep satellite and "less than 180-day" containers of hazardous waste closed, unless adding or removing hazardous waste.

- Failure to comply with preparedness and prevention requirements. Specifically, at the time of the inspection, at the Main Hazardous Waste Storage Area, Connors Homes did not maintain emergency equipment such as an internal communication or alarm system capable of providing emergency instruction (voice or signal) to facility personnel, portable fire equipment, spill control equipment, and water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic fire control sprinklers.

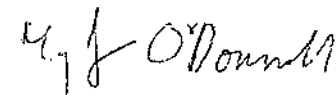
**Connor Homes must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE**, submit a written description, with supporting documentation, of the actions taken to address the issues described in this notice. Submit the information to:

**Andrew Meyer, Environmental Scientist  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912**

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. §6928. If you have any questions regarding this NOTICE, please contact Andrew Meyer, of my staff, at 617-918-1405.

Sincerely,



Mary Jane O'Donnell, Manager  
RCRA, EPCRA & Federal Programs Unit

cc: Steven Simoes, VTDEC  
File